

Oliver D. Smith  
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Radlett, Hertfordshire  
WD7 8AU, England  
oliveratlantis@gmail.com

Pro se

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

OLIVER D. SMITH

Plaintiff,

vs.

RATIONALMEDIA FOUNDATION

Defendant

Case No. **25cv228 JMR**

**COMPLAINT**

**Jury Trial: No**

**PLAINTIFF, DEFENDANT, VENUE and JURISDICTION**

1. Plaintiff Oliver D. Smith (Oliver Dean Smith) ("**ODS**") is a pro se individual.

Address: 7 Aldenham Road, Radlett, Hertfordshire, WD7 8AU, England, UK.

Email: oliveratlantis@gmail.com

Phone: + 44 07769176821

2. Defendant RationalMedia Foundation ("**RMF**") is a non-profit corporation which owns and operates the website rationalwiki.org (an online wiki). The RMF's website points out that it is "organized under the laws of New Mexico"<sup>1</sup> and provides the following mailing address:

RationalMedia Foundation 122 Girard Av NE, Albuquerque, NM, 87106, USA.

Email: foundation@rationalwiki.org

Phone: N/A

<sup>1</sup> <https://rationalweb.org/about/>

1 3. Venue is appropriate in the United States District Court for the District of New Mexico.

2  
3 4. Jurisdiction pursuant to 28 U.S.C. § 1332.

4  
5 **FACTS**

6 5. RationalWiki is an online wiki written from a scientific scepticism perspective which criticises  
7 and refutes fringe science, pseudoscience and conspiracy theories such as Moon landing hoax.

8  
9 6. Unlike Wikipedia, RationalWiki does not have any checkuser tool to check the IP-addresses  
10 of user accounts nor are their ‘sockpuppet investigations’ to determine (with veracity) who is  
11 the owner of accounts. This has resulted in countless incorrect accounts being blocked because  
12 of misidentification; blocks based on mere speculation with no technical evidence. Behavioral  
13 evidence used to block accounts is dubious at best. RationalWiki is rife with imposter accounts  
14 (fake accounts including malicious impersonations as well as less harmful parodies or spoofs).

15  
16 7. ODS has been extensively impersonated on RationalWiki with both malicious impersonation  
17 accounts and comical spoof accounts of his real name and pseudonym(s). These fake accounts  
18 are recent as well as years old and were described as “pseudo-Smiths” by an admin.<sup>2</sup> A search  
19 of RationalWiki’s blog log reveals approximately 140 fake accounts of ODS stretching back  
20 to 2016 (many in his real name), although dozens more impersonations have not been blocked.  
21 However, numerous accounts have been incorrectly blocked in ODS’s name based on either  
22 accident (confusion) or sheer carelessness (misidentification with no attempt to verify the real  
23 account owner). Despite ODS quit editing RationalWiki on 17 September 2020; the following  
24 accounts (and IPs) have been erroneously blocked under his name after that time on the wiki:  
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27  
28 <sup>2</sup> [https://rationalwiki.org/wiki/RationalWiki\\_talk:All\\_things\\_in\\_moderation/Archive71#Group\\_of\\_long-term\\_trolls\\_.28likely\\_EmilOWK\\_ban\\_evasion.29](https://rationalwiki.org/wiki/RationalWiki_talk:All_things_in_moderation/Archive71#Group_of_long-term_trolls_.28likely_EmilOWK_ban_evasion.29)

- 1 • “11:01, 9 November 2020 Judge Dredd talk contribs blocked **MrYellow** talk contribs with an expiration time of
- 2  $\pi \times \text{infinity!}$  (account creation disabled, cannot edit own talk page) (Ban evasion: Aeschylus/Smith).”<sup>3</sup>
- 3 • “9 November 2020 Spud talk contribs blocked **REllis** talk contribs with an expiration time of  $\pi \times \text{infinity!}$  (account
- 4 creation disabled, email disabled, cannot edit own talk page) (Block evasion: ...Oliver!).”
- 5 • “11:13, 28 November 2020 Judge Dredd talk contribs blocked **Enigma** talk contribs with an expiration time of
- 6  $\pi \times \text{infinity!}$  (account creation disabled, cannot edit own talk page) (Ban evasion: Smith).”
- 7 • “4 December 2020 Spud talk contribs blocked **Dumbo** talk contribs with an expiration time of  $\pi \times \text{infinity!}$
- 8 (account creation disabled, email disabled, cannot edit own talk page) (Block evasion: ...Oliver!).”
- 9 • “13:34, 4 January 2021 Judge Dredd talk contribs blocked **Blinkman** talk contribs with an expiration time of
- 10  $\pi \times \text{infinity!}$  (account creation disabled, cannot edit own talk page) (Ban evasion: Smith (thank for the article)).”
- 11 • “15:03, 5 April 2021 Judge Dredd talk contribs blocked **Mysia** talk contribs with an expiration time of  $\pi \times \text{infinity!}$
- 12 (account creation disabled, cannot edit own talk page) (Ban evasion: Aeschylus/Smith).”
- 13 • 22:04, 26 April 2021 Summa Atheologica talk contribs blocked **Oenophyta** talk contribs with an expiration time
- 14 of  $\pi \times \text{infinity!}$  (account creation disabled, cannot edit own talk page) (Agent of Smith: see the coop they made.).”<sup>4</sup>
- 15 • “12:47, 18 May 2021 Spud talk contribs blocked **2a0b:f4c1::6** talk with an expiration time of 31415 seconds
- 16 (about 9 hours) (account creation disabled, email disabled, cannot edit own talk page) (...Oliver!).”
- 17 • “18:48, 27 May 2021 Rockford the Roe talk contribs blocked **37.120.148.82** talk with an expiration time of
- 18 31415 seconds (about 9 hours) (account creation disabled) (Ban evasion: ...Oliver).”
- 19 • “13:58, 23 May 2021 Spud talk contribs blocked **194.39.126.89** talk with an expiration time of 31415 seconds
- 20 (about 9 hours) (account creation disabled, email disabled, cannot edit own talk page) (Ban evasion: ...Oliver!).”
- 21 • “16:17, 6 December 2021 Techpriest talk contribs blocked **Tabber** talk contribs with an expiration time of
- 22  $\pi \times \text{infinity!}$  (account creation disabled, cannot edit own talk page) (Ban evasion: Smith).”
- 23 • “13:54, 14 October 2022 Plutocow talk contribs blocked **157.245.42.213** talk with an expiration time of 314159
- 24 seconds (about 3.6 days) (anonymous users only, account creation disabled) (Ban evasion: Oliver Smith).”

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26 <sup>3</sup> There is another account, and an IP connected to MrYellow (neither are listed here as they were not blocked as ODS).

27 <sup>4</sup> It is unclear by “Agent of Smith” if this account was blocked as suspected of being ODS or as someone else (i.e., acting

28 on his behalf). Regardless, ODS never created or asked anybody to create this account and does not know who created it.



- 1 • “19:50, 2 November 2022 Plutocow talk contribs blocked **Tristan albatross** talk contribs with an expiration
- 2 time of 3141 seconds (about 1 hour) (account creation disabled) (Suspected Oliver Smith sockpuppet).”
- 3 • “04:19, 3 November 2022 Plutocow talk contribs blocked **Edge** talk contribs with an expiration time of
- 4  $\pi \times \text{infinity!}$  (account creation disabled) (Ban evasion: Definitely Oliver Smith).”
- 5 • “01:35, 5 January 2023 Plutocow talk contribs blocked **Dave Truck Driver** talk contribs from editing the page
- 6 Talk:Michael Coombs with an expiration time of 31415 seconds (about 9 hours) (account creation disabled)
- 7 (Suspected Oliver Smith alt, prove us wrong).”
- 8 • “19:35, 28 June 2023 Plutocow talk contribs blocked **Griffina** talk contribs with an expiration time of  $\pi \times \text{infinity!}$
- 9 (account creation disabled) (Ban evasion: Oliver Smith, continuing the same pointless feud).”
- 10 • 11:34, 19 July 2023 Spud talk contribs blocked **Boar** talk contribs with an expiration time of  $\pi \times \text{infinity!}$  (account
- 11 creation disabled, email disabled, cannot edit own talk page) (Ban evasion: Oliver D. Smith).”
- 12 • “16:28, 26 May 2024 Bongolian talk contribs blocked **138.68.180.65** talk with an expiration time of 314159
- 13 seconds (about 3.6 days) (anonymous users only, account creation disabled) (Ban evasion: Smith, ban evasion).”

14 8. The above blocked accounts can be found by accessing the public “block log”.<sup>5</sup>

15 9. To provide examples of the excessive fake accounts – the following can be found in the public

16 blog log and were blocked as suspected impersonations, spoofs and trolls using ODS’s name:

- 17 • “14:16, 6 February 2025 Oldman4 talk contribs blocked **Cromptonite** talk contribs with an expiration time of
- 18  $\pi \times \text{infinity!}$  (account creation disabled, cannot edit own talk page) (Obvious Smith impersonation).”
- 19 • “22:05, 24 July 2023 DuceMoosolini talk contribs blocked **Elysium** talk contribs with an expiration time of 3.14
- 20 weeks (about 22 days) (account creation disabled, cannot edit own talk page) (...Smith drama back in here).”
- 21 • “09:45, 21 September 2023 Carthage talk contribs blocked **Oliver Gay Smith** talk contribs with an expiration
- 22 time of  $\pi \times \text{infinity!}$  (account creation disabled, cannot edit own talk page) (impersonating existing editor).”
- 23 • “01:18, 30 May 2021 Spud talk contribs blocked Smith, **Oliver D** talk contribs with an expiration time of
- 24  $\pi \times \text{infinity!}$  (account creation disabled, email disabled, cannot edit own talk page) (impersonating existing editor.)

25  
26  
27  
28 <sup>5</sup> <https://rationalwiki.org/wiki/Special:Log/block>



- 1 • 00:35, 23 April 2021 GeeJayK talk contribs blocked **Ollie Smith is bald** talk contribs with an expiration time of
- 2  $\pi \times \text{infinity!}$  (account creation disabled, cannot edit own talk page) (Ban evasion)."
- 3 • "21:07, 16 April 2021 Christopher talk contribs blocked **Oliver Smith** talk contribs with an expiration time of
- 4  $\pi \times \text{infinity!}$  (account creation disabled) (Unacceptable username)."
- 5 • "17:45, 21 April 2023 Plutocow talk contribs changed block settings for **Oliver Smith Bald Antifa** talk contribs
- 6 with an expiration time of  $\pi \times \text{infinity!}$  (account creation disabled, cannot edit own talk page) (ban evasion)."
- 7 • 17:44, 21 April 2023 Plutocow talk contribs changed block settings for **Oliver Smith Big Slaphead** talk contribs
- 8 with an expiration time of  $\pi \times \text{infinity!}$  (account creation disabled, cannot edit own talk page) (ban evasion)."
- 9 • "15:57, 5 April 2021 Christopher talk contribs blocked **OSmithAsexual** talk contribs with an expiration time of
- 10  $\pi \times \text{infinity!}$  (account creation disabled) (Ban evasion)."
- 11 • "13:00, 27 October 2022 Spud talk contribs blocked **Oliver Smedt** talk contribs with an expiration time of
- 12  $\pi \times \text{infinity!}$  (account creation disabled, email disabled, cannot edit own talk page) (Ban evasion)."
- 13 • "9 November 2022 Plutocow talk contribs blocked **The Smiths** talk contribs with an expiration time of
- 14  $\pi \times \text{infinity!}$  (account creation disabled, cannot edit own talk page) (Ban evasion)."
- 15 • "23:17, 9 November 2020 Rockford the Roe talk contribs blocked Oliver Smith Schizoid talk contribs with an
- 16 expiration time of  $\pi \times \text{infinity!}$  (account creation disabled, cannot edit own talk page) (Ban evasion)."
- 17 • "05:27, 23 September 2020 LeftyGreenMario talk contribs blocked **Fragments** talk contribs with an expiration
- 18 time of 314159 seconds (about 3.6 days) (account creation disabled) (Smith rereg)."<sup>6</sup>
- 19 • "13:43, 31 May 2019 GrammarCommie talk contribs blocked Oliver D. Smith Legend talk contribs with an
- 20 expiration time of  $\pi \times \text{infinity!}$  (account creation disabled, cannot edit own talk page) (Ban evasion: Spam, drama).
- 21 • "12:42, 4 August 2018 GrammarCommie talk contribs blocked **Oliver Schizoid Smith** talk contribs with an
- 22 expiration time of  $\pi \times \text{infinity!}$  (account creation disabled, cannot edit own talk page) (Harassment)."
- 23 • 12:41, 4 August 2018 GrammarCommie talk contribs blocked **Oliver Schizo Smith** talk contribs with an
- 24 expiration time of  $\pi \times \text{infinity!}$  (account creation disabled, cannot edit own talk page) (Harassment)."
- 25 • "21:25, 8 November 2016 Ikanreed talk contribs blocked **Oliver D Smith** talk contribs with an expiration time
- 26 of  $\pi \times \text{infinity!}$  (account creation disabled) (Harassment)."

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27 <sup>6</sup> This account was mistakenly blocked as ODS (as an account re-registration) but later recognized as an impersonation

28 and was described elsewhere as an imposter by multiple admins. However, the block log was not updated or corrected.

10. In response to the listed incorrect blocked accounts and IP-address blocks at [7], ODS emailed RMF and RationalWiki admins about these errors. The RMF ignored all his emails and failed to respond and properly investigate. However, one admin, did respond to ODS by email and independently concluded there was no reliable evidence linking ODS to any of these blocked accounts/IPs and removed Smith's name from a few. For example, the blog log for the account Boar was updated: "I agree this account should be blocked but we should not name who we thinks owns this account per lack of evidence."<sup>7</sup> Similarly, Smith's name was removed from the blocked IP-address 138.68.180.65, after the real user of that IP had admitted the mistake.<sup>8</sup>

11. Although many accounts and multiple IP-addresses continue to be wrongly blocked in Smith's name,<sup>9</sup> several admins cast doubt on whether ODS owns them (on the block log itself), which highlights how flawed and questionable blocks on RationalWiki are since there is no technical evidence to identify who owns any account. Admins are therefore left speculating with flimsy evidence and guessing (based on behavior alone<sup>10</sup>) and sometimes do not agree with each other. As an example, admins disagreed whether ODS owned the user Oenophyta; one wrote: "Not definitely Smith...".<sup>11</sup> Nevertheless, this account still ended up (incorrectly) blocked as ODS. The account Griffina was incorrectly blocked as ODS, but a separate admin undid this mistake.<sup>12</sup> The account Mysia was also unblocked for lack of evidence ODS used this account.

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<sup>7</sup> <https://rationalwiki.org/w/index.php?title=Special:Log&page=User%3ABoar&type=block>

<sup>8</sup> <https://rationalwiki.org/w/index.php?title=Special:Log/block&page=User%3A138.68.180.65>

<sup>9</sup> There are many more incorrect blocked accounts in ODS's name that predate 17 September 2020 (not listed here).

<sup>10</sup> The so-called 'duck test' but the problem with this is RationalWiki is rife with impersonation accounts with so-called trolls regularly creating fake accounts of different users meaning it is difficult to distinguish a real user from an imposter.

<sup>11</sup> <https://rationalwiki.org/w/index.php?title=Special:Log&page=User%3AOenophyta&type=block>

<sup>12</sup> <https://rationalwiki.org/w/index.php?title=Special:Log/block&page=User%3AGriffina>



12. On 15 January 2025, a Trustee of the RMF (who uses the account DuceMoosolini) baselessly suggested ODS was active on RationalWiki under an account (Oldman4). The actual owner of the account in question disproved this allegation by going on web camera to a RationalWiki moderator.<sup>13</sup> Despite this case of mistaken identity, DuceMoosolini never apologized and then made an unsubstantiated and false statement about ODS and Oldman4 as being meatpuppets.<sup>14</sup>

13. This case of mistaken identity has resulted in ODS being severely targeted and harassed online because the user Oldman4 created dozens of articles criticising controversial individuals on the wiki; most notably proponents of the carnivore diet, climate-change denialists, Holocaust deniers, white supremacists and quacks (or medical frauds). An assortment of individuals with these extreme, disagreeable and unpleasant viewpoints are now attacking and maligning ODS on different websites and on social media (mistakenly believing that he is the user Oldman4).

14. The incorrect blocking of the account Boar on 19 July 2023 has also had very harmful effects on ODS. This account was erroneously blocked under ODS's name by another Trustee of the RMF (who uses the account Spud and whose real name is Simon Peter Hughes). Spud wrote on the block log: "Ban evasion: Oliver D. Smith".<sup>15</sup> This was replaced by another admin, but ODS had already been harmed by this reckless error. Since the Boar account created the article on the behavioral geneticist Emily Willoughby – this instigated her friends, as well as her ex-boyfriend (Jonathan Kane) to relentlessly malign ODS online which still continues to this day.

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<sup>13</sup> [https://rationalwiki.org/wiki/RationalWiki:Chicken\\_coop/Archive139#Oldman4\\_is\\_not\\_Smith](https://rationalwiki.org/wiki/RationalWiki:Chicken_coop/Archive139#Oldman4_is_not_Smith)

<sup>14</sup> A meatpuppet is defined as an account invited to an internet discussion solely to influence it on behalf of someone else. The reality is ODS only had brief communication with Oldman4 by email (about four emails over two years). Suffice to say, he is not and has never been anyone's meatpuppet. This false assertion was uncritically copied across the internet.

<sup>15</sup> <https://rationalwiki.org/w/index.php?title=Special:Log&page=User%3ABoar&type=block>



**STATEMENT OF CLAIM**

15. ODS's claim against the Defendant RationalMedia Foundation is defamation.

16. Elements of defamation include a "defamatory communication published by the defendant, to a third person, of an asserted fact, of and concerning the plaintiff, and proximately causing actual injury to the plaintiff." (*Clough v. Adventist Health Sys., Inc.*, 108 N.M. 801, 806, 780 P.2d 627, 632 (1989)). ODS maintains these elements have been met and the RMF has libeled him by (a) incorrectly writing Boar account is "Oliver D. Smith" on the block log<sup>16</sup> and (b) falsely claiming Oldman4 is ODS' meatpuppet.<sup>17</sup> The former was made as a statement of fact not opinion, while the latter is reasonably interpreted as a statement of fact.<sup>18</sup> Both statements of fact are false and have caused considerable harm to the Plaintiff (which is explained below).

17. ODS is aware that RationalWiki normally has immunity of libel lawsuits under Section 230 of the Communications Decency Act; in other words, service providers (interactive computer services) are not held liable for third-party content since they are not the publishers. However, ODS argues that immunity does not apply to this claim because (a) the block log is part of the RMF's software on RationalWiki, (b) a Trustee of the RWF incorrectly and recklessly wrote "Oliver D. Smith" on the Boar account block log and (c) the RMF (unlike Wikipedia) has no Terms of Use policy, at least not one covering a section on blocked or termination of accounts; (d) A RMF Trustee wrote the false statement of fact about Oldman4 being ODS' meatpuppet.

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<sup>16</sup> <https://rationalwiki.org/w/index.php?title=Special:Log&page=User%3ABoar&type=block>

<sup>17</sup> [https://rationalwiki.org/wiki/RationalWiki:Chicken\\_coop/Archive139#Oldman4\\_is\\_not\\_Smith](https://rationalwiki.org/wiki/RationalWiki:Chicken_coop/Archive139#Oldman4_is_not_Smith)

<sup>18</sup> Although DuceMoosolini only suggested (as an opinion) that ODS owned the Oldman4 account, his wording is much stronger for the meatpuppet accusation which is interpretable as having been written as statement of fact. This is supported by DuceMoosolini highlighting the word "is" in one of his edits and statements i.e., "I'm convinced it *is* meatpuppetry".

18. The Defendant's false statements about the Plaintiff have caused him injury to his reputation and emotional distress resulting in a criminal report (cyber-harassment) being filed in the UK; ODS has had to endure individuals maliciously targeting him based on the misinformation he created the Emily Willoughby article (as Boar), as well as individuals erroneously believing that he is associated with Oldman4 as a "meatpuppet" or the owner of the Oldman4 account. Despite this is a proven case of mistaken identity, ODS continues to be unreasonably vilified. The statement "Ban evasion: Oliver D. Smith" on the Boar account is defamatory per se. ODS is not evading a ban from RationalWiki and this false statement conveys he is of bad character.

#### **REMEDY OR RELIEF SOUGHT**

19. \$100,000 compensatory damages for harm to reputation and emotional distress.

#### **PLAINTIFF'S CERTIFICATION AND WARNINGS**

20. By signing below, plaintiff certifies to the best of his knowledge, information, and belief: the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); the claims are supported by existing law or by a nonfrivolous argument to change existing law; the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11. Finally, the Plaintiff, declares under penalty of perjury – that the aforementioned is true and correct – to the best of his knowledge.

**Dated:** 23.02.2025 (23 February 2025)

**Signed:**



Oliver D. Smith, pro se.



## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

Oliver D. Smith

(b) County of Residence of First Listed Plaintiff Plaintiff lives in the UK.  
(EXCEPT IN U.S. PLAINTIFF CASES)(c) Attorneys (Firm Name, Address, and Telephone Number)  
Pro se

## DEFENDANTS

RationalMedia Foundation

County of Residence of First Listed Defendant  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                                   | DEF                        |   | PTF                        | DEF                                   |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1            | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input checked="" type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2            | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5            |
| Citizen or Subject of a Foreign Country | <input checked="" type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6            |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input checked="" type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice <b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>INTELLECTUAL PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education <b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

## V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

NM Stat § 30-11-1 (2024)

Brief description of cause:  
Libel

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

23 February 2025

SIGNATURE OF ATTORNEY OF RECORD

Oliver D. Smith pro se

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

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EXHIBIT A



Universal Credit

Oliver Smith: Sign out

**Payments**

Oliver Smith

7 Aldenham Road

RADLETT

WD7 8AU

**Assessment period: 5 December to 4 January 2025****[Need help understanding your assessment period?](#)**Your payment this month was **£809**

This was paid on 11 January 2025

**What you're entitled to****Standard allowance**

£393.45

You get a standard amount each month. You said you're single

**Limited capability for work and work-related activity**

£416.19

You said your health affects you at work or prevents you from working

**Total entitlement before deductions****£809.64****What we take off (deductions)****Money, savings and investments**

minus- £0.00

The first £6,000 of your money, savings and investments does not affect your payment. If you have over £6,000 up to £16,000, every £250 reduces your Universal Credit by £4.35. For any remaining amount that is not a complete £250, a further £4.35 is also deducted.

**Total deductions****£0.00****Your total payment for this month is****£809.64****If your circumstances change**

You must immediately [report changes in your circumstances](#) that could affect your Universal Credit payments.



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**CN 22**

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Sender's  
Address &  
Postcode

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Rudlett WD7 8AU  
England*

**Contents**

Tick all that apply

☐ Gift

☒ Documents

☐ Sale of Goods

☐ Commercial Sample

☐ Returned Goods

☐ Other:

Description of contents

Quantity

Weight (kg)

Value (GBP)

*Legal  
documents*

*1*

*102  
grams*

Total

Commercial items only; if known  
enter HS tariff no. & origin

If applicable, VAT reg or EORI number

I, the undersigned, whose name and address are given on the item, certify that the  
particulars given in this declaration are correct and that this item does not contain any  
dangerous article or articles prohibited by legislation or by postal or customs regulations.

Sign &  
Date

*[Signature]* *24 February 2025*

CN22A (Jan 21)

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